

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

LOCAL 705 INTERNATIONAL)	
BROTHERHOOD OF TEAMSTERS)	
PENSION FUND, <i>et al.</i> ,)	CIVIL ACTION
)	
Plaintiffs,)	NO. 10 C 6352
)	
vs.)	JUDGE RONALD A. GUZMAN
)	
A.D. CONNER, INC., an Illinois)	
corporation,)	
)	
Defendant.)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, A.D. CONNER, INC., an Illinois corporation, in the total amount of \$1,329,818.01, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$28,517.44.

On October 13, 2010, the Summons and Complaint was served on the Registered Agent (by tendering a copy of said documents to his employee, Catheline Rankovich) at his place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on November 3, 2010.

On January 3, 2011, Defendant filed a motion to consolidate Case No. 10 C 6916 with the instant case. On January 5, 2011, the Court granted Defendant's motion to vacate all technical defaults and granted Defendant to and including February 4, 2011 to answer Plaintiffs' Complaint. On May 4, 2011, the Court denied Defendant's motion to consolidate cases and gave Defendant to

until May 18, 2011 to answer Plaintiffs' complaint. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Patrick N. Ryan

Patrick N. Ryan
Attorney for Plaintiffs
Baum Sigman Auerbach & Neuman, Ltd.
200 West Adams Street, Suite 2200
Chicago, IL 60606-5231
Bar No.: 6278364
Telephone: (312) 236-4316
Facsimile: (312) 236-0241
E-mail: pryan@baumsigman.com

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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that on or before the hour of 5:00 p.m., this 8th day of June 2011, he caused to be electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

L. Steven Platt
Pedersen & Houpt
161 N. Clark Street, Suite 3100
Chicago, IL 60601
lsplatt@pedersenhaupt.com

/s/ Patrick N. Ryan _____

Patrick N. Ryan
Attorney for Plaintiffs
Baum Sigman Auerbach & Neuman, Ltd.
200 West Adams Street, Suite 2200
Chicago, IL 60606-5231
Bar No.: 6278364
Telephone: (312) 236-4316
Facsimile: (312) 236-0241
E-mail: pryan@baumsigman.com